

**DECLARATION OF ELIZABETH ANNE MILES
PURSUANT TO 28 U.S.C. § 1746**

I, ELIZABETH ANNE MILES, DECLARE AS FOLLOWS:

1. I have personal knowledge of the facts stated herein and, if called to testify, I could and would competently testify to the same.
2. My formal education includes a bachelor's degree in Economics and Spanish from the University of Kentucky, a graduate certificate in Geographic Information Sciences from George Mason University, and courses at Northern Virginia Community College in SQL as non-degree career training. I have also had professional training in Microsoft Access, Microsoft Excel, and Microsoft VBA.
3. From December 2005 to October 2012, I was a research analyst with the FTC's Bureau of Economics.
4. Since October 2012, I have served as a data analyst with the Federal Trade Commission ("FTC"), Bureau of Consumer Protection, Division of Consumer Response and Operations.
5. Among other things, my work as a data analyst involves the analysis of electronic information stored on computer systems and related data storage devices/media. One such database is the CRM (Customer Relations Management database) for Elite IT Partners ("Elite"), which was obtained from Elite during the immediate access ordered by the Court in *FTC v. Elite IT*.
6. Elite's CRM contains data about all sales to consumers, including names, payments, and refunds, and chargebacks.
7. I was asked to analyze Elite's CRM to assist in the administration of redress to consumers, and more specifically, to identify the number of consumers who paid Elite, refunds to, and successful chargebacks, by these consumers.

8. I was asked by counsel analyze Elite's CRM to identify the total payments, refunds, and chargebacks starting on February 25, 2016. These are as follows:

Payments (\$)	\$10,013,575.26
Refunds and Chargebacks (\$)	\$539,280.14
Net Payments (\$)	\$9,474,225.12

9. Counsel also asked me to identify the total number of consumers in Elite's CRM who lost money and the average loss by such consumers. These are as follows:

Total Consumers (#)	34,314
Average Loss per Consumer (\$)	\$420.50

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Dated: April 12, 2022


Elizabeth Anne Miles